FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SEP 1 5 2020

UNITED STATES OF AMERICA	)	CLERK U.S. DISTRICT COURT
	)	WEST. DIST. OF PENNSYLVANIA
v.	)	Criminal No. 20-247
	)	(18 U.S.C § 1546(a))
	)	
IDERTSETSEG RAGON	)	[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

On or about June 20, 2017, in the Western District of Pennsylvania, the defendant,

IDERTSETSEG RAGON, did subscribe as true under penalty of perjury pursuant to 28 U.S.C.

§ 1746, a false statement with respect to a material fact in a document required by the immigration

laws and regulations prescribed thereunder, to wit, Form I-485, Application to Register Permanent

Residence or Adjust Status, that is, she stated she had never been arrested, cited, charged, indicted,

convicted, fined, or imprisoned for breaking or violating any law or ordinance, which statement

the defendant then and there knew was false, in that she had been indicted, cited, and charged for

intentionally causing severe bodily harm to others in Mongolia.

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

The grand jury further charges:

On or about September 15, 2019, in the Western District of Pennsylvania, the defendant, IDERTSETSEG RAGON, did subscribe as true under penalty of perjury pursuant to 28 U.S.C. § 1746, a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, to wit, Form I-751, Petition to Remove Conditions on Residence, that is, she stated she had never been arrested, detained, charged, indicted, fined, or imprisoned for breaking or violating any law in the United States or abroad, which statement the defendant then and there knew was false, in that she had been indicted, cited, and charged for intentionally causing severe bodily harm to others in Mongolia.

In violation of Title 18, United States Code, Section 1546(a).

A True Bill,

_____
Foreperson

_____
SCOTT W. BRADY
United States Attorney
PA ID No. 88352

2